

Mobile Authentication Corporation Privacy Policy

**LAST UPDATE OF THIS DOCUMENT:
NOVEMBER 14, 2014.**

Welcome to the Mobile Authentication Corporation (hereinafter "MAC") Application and website!

The MAC website and any related or mobile device application, all of its characters, its content and the designs (hereinafter referred to collectively as the "Site") are owned by Mobile Authentication Corporation, Inc. a Delaware corporation based in Scottsdale, Arizona, USA. The terms and conditions contained in this document, the "Terms of Service," govern the relationship between YOU, the User, and MAC. For convenience, throughout this Privacy Policy material, we will refer to MAC, its successors and assigns as "MAC" or "Us" or "We" or "Our," and will refer to You as "You" or "Your" or "Yours."

This Privacy Policy describes: (a) what type of information we collect and how we do so; (b) how the information is used and for what purposes; (c) with whom we share or disclose such information; (d) how You can access and update such information; (e) the choices You can make about how we collect, use and share Your information; (f) how we safeguard Your personal information.

If You have questions regarding this Privacy Policy or our collection and use of information, please contact us as described in the section labeled ("Contact Us").

Your privacy is of the utmost importance to MAC, and We strive to protect it.

By using Our Site, products, services, or in any way interacting with Us, You consent to this Privacy Policy. Please do not engage in any of the activities generated or related to the Site if you do not agree with the terms of this Privacy Policy. The Site is the exclusive property of MAC. All information collected on the Site is Our exclusive property.

Your privacy is important to Us. The purpose of this Privacy Policy is to inform you about the information We may gather about You, how We may use that information, whether We disclose it to anyone, and the choices You have regarding Our use of the information We collect.

Information Collected by MAC

MAC collects information from You based upon Our business relationship and Your use of the Site, Our services and Our products as set forth below:

Content Registration Process. In order to access and view some content on the Site You are required to register with MAC before content is made available to You. During the registration process, You are required to provide Us with certain contact information, including your name, address, phone number and email address. We use this information to contact You about the services We offer in which You have expressed interest. We need specific information because Our processes and services include the ability to reliably know that You are trying to use a bank card in a transaction where it is vitally important to know that You, in fact, are the one making the transaction.

Client Support Portal. When You contact MAC customer support ("Customer Support") using the address below, We may ask You for personally identifiable information regarding your inquiry, such as your name, email address or telephone number. It is our job and privilege to ask You to take reasonable steps to identify Yourself in order that we may protect the information You share with Us from unauthorized access or disclosure.

MAC's Customer Support Portal access: CustomerSupport@mobileauthcorp.com. Our toll free telephone number is: **844-427-0411**.

Cookies. When you contact Customer Support through the Client Support Portal, MAC's web server sends a cookie to your computer or mobile device. Cookies are files that web browsers place on a device's hard drive and are used to tell Us whether customers and visitors have visited the Site previously.

The Client Support Portal uses session cookies containing encrypted information to allow the system to uniquely identify You while You are logged in. This information allows Us to process your online data and requests. Session cookies help Us make sure You are Our customer and the person with whom we have established an account previously. We use persistent cookies, which only We can read and use, to identify the fact that You are a MAC customer or prior site visitor. Users who disable their browser's ability to accept cookies will be able to browse the Site, but will not be able to successfully use certain Customer Support features.

We also may from time to time engage third parties to track and analyze non-personally identifiable usage and volume statistical information from visitors to Our Site to help Us administer Our Site and improve its quality. Such third parties may use cookies to help track visitor behavior. Such cookies will not be used to associate individual Site visitors to any personally identifiable information. All data collected by such third parties on Our behalf is used only to provide Us with information on site usage and is not shared with any other third parties. It is possible to configure your browser to reject cookies by modifying the browser settings or preferences. If you wish to do so, We recommend that You consult the information provided in the browser or contact the browser vendor for help or instructions.

Correspondence. If you send Us personal correspondence, such as emails or letters, We may collect such information into a file specific to You.

Mobile User Information. As part of Our service offering, We sometimes receive personal information from wireless carriers and operators in order to provision the specific content and data services requested by individual users. All such personal information is acquired from either the wireless carrier's website or from the user's mobile device via the wireless carrier's network. This personal data is usually limited to the user's cell phone number. In some cases, we may receive authentication information directly from mobile users, including in the form of a personal information number (PIN) previously sent to a mobile user.

Incidental Business Contact Information. We collect personal information about You when you submit survey responses or other information You give to us relevant to Your business relationship with Us.

MAC collects and uses Your personal information to give You high quality customer service, to provide You with convenient access to Our products and services, and to make You aware of the latest offerings from MAC and its business associates and partners. We only use Your information for the purposes for which it is gathered, and We take reasonable precautions to maintain the reliability of such information.

One of the Services that You have engaged from MAC is the provision of a One-Time Password (hereinafter "OTP") authentication system to protect Your identity and to discover and thwart unauthorized usage of Your credit card, bank card, bank account or other type of process where a two-method authentication process is involved (perhaps even to open your computer, and the like). The provision of an OTP by MAC may include an advertising message along with your OTP. When You subscribed for the MAC Service, You "opted in" to receive ads with the delivery of Your OTP.

Out of respect for Your privacy, You have the option to unsubscribe from receiving some or all of the messages. Please see the "Choice and Opt-out" section below.

Service-Related Announcement

We will send You service-related announcements when it is necessary to do so. For instance, if Our service is temporarily suspended for maintenance, We might send You an email or message on Your mobile device. Generally, You may not opt-out of these communications, which are not promotional in nature. If You do not wish to receive them, You have the option to deactivate your account. We therefore distinguish service-related announcements from advertiser promotional content and even if You opt-out of receiving promotional advertising, You will not be able to opt out of receiving service-related announcements.

Customer Service

We will communicate with You in response to Your customer service inquiries, to provide the services You request, and to manage Your account.

General Policies

As a matter of policy, We do not sell or rent any of Your personal information to third parties for any advertising or marketing purposes.

Your Account information, IP addresses or personal information may be disclosed: (a) to protect the rights or property of MAC; (b) to render the service YOU requested; (c) when in good faith We believe that the information is required to be disclosed in response to any legal process or proceeding; (d) to protect Our legal rights or remedies; (e) to allow Us to satisfy any applicable law, regulation or government request; (f) to report any suspected crime or other offensive behavior to the appropriate authorities; (g) when We have a good faith belief that there is a threat to the health and/or safety of YOU or a third party; (h) if We believe that our Site or Service are being used in the commission of a crime and for the purposes of reporting same to the appropriate authorities; (i) to allow Us to enforce MAC's Terms of Service, Privacy Policy or any other agreement, terms or policy with respect to the Service or Site.

Sale or Merger of MAC

In the event that MAC enters into a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, We may transfer all of Your information, including personal information, to the successor organization in such transition. If material changes to the Privacy Policy will occur as a result of the business transition, we will notify You and other users, via your e-mail address as on file in your Account information, of the business transition prior to transferring your personal information.

MAC's Duty to Comply with Laws

We may disclose Your Personal Data to governmental authorities when required or reasonably requested to do so by such governmental authorities. This Privacy Policy does not apply to the extent that it is in conflict with any law that may be applicable to the Personal Data of a Data Subject.

Data Processing

MAC, in the provision of its Services, is a processor of data (hereinafter “Data Processor”). As such, MAC will process Personal Data pursuant to the instructions of the applicable Client within the parameters of the Service provision. MAC may use the services of a third party Data Processor to process Personal Data in accordance with purposes identified for delivery of MAC’s Services to You. Except as stated herein, MAC will not permanently transfer Personal Data to a third party. MAC, within the parameters of its Service offerings, is not be responsible for determining the authenticity of any purported data that You have supplied to Us. Supplying MAC with erroneous, false or incomplete information may interfere with the proper provision of MAC Services. We may need to contact You in the event that Your data is incomplete, appears to be erroneous or has somehow been corrupted in Data Processing from Your device or computer, a transmission problem, lack of bandwidth to complete send-receive transmissions or data that has been intentionally corrupted or hacked by criminals or other unauthorized users.

Data Control

MAC, by definition, is a “Data Controller.” MAC receives Personal Data about our business contacts in the course of its business relationships. MAC owns and controls any and all such Personal Data as stated in this Privacy Policy.

Disclosure of Information

MAC processes, on behalf of its clients, Personal Data that may have been received from the European Union. “Personal Data” or “Personal Information” means information relating to an identified or identifiable person. MAC complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries and Switzerland. MAC certifies that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

Under the Safe Harbor Framework, MAC primarily acts as a Data Processor and each Client acts as a Data Controller. For the purposes of the Safe Harbor Frameworks and this Privacy Statement: a “Data Processor” is an entity that processes Personal Data on behalf of a Data Controller; a “Data Controller” is an entity that determines the purposes for which Personal Data are processed. To “process” Personal Data means to carry out an operation or set of operations on such Personal Data, such as collecting, recording, storing, disclosing, or organizing it. The “Data Subject” means the person to whom a certain set of Personal Data relate; for example, the person who responds to a survey.

Underage Use Not Allowed

Protecting the privacy of children is important to MAC. For that reason, the Site is structured specifically to not attract anyone under 18. We do NOT collect or maintain personally identifiable information at the Site from those who MAC actually knows are under 18. If MAC learns or is notified that it has collected information from users under the age of 18, MAC will immediately delete such personally identifiable information.

Opt-Out

We provide You the opportunity to 'opt-out' of receiving MAC's service offering, such service may include advertiser materials. NO ADVERTISER SENDING YOU AN AD MESSAGE THAT IS COUPLED WITH YOUR OTP RECEIVES YOUR INFORMATION AND NO ADVERTISER WILL CONTACT YOU OR SEND YOU ADVERTISEMENTS SEPARATELY OR INDEPENDENTLY FROM EACH OTP. Should You register with MAC, but do not wish to receive advertisers' messages, You may opt-out of MAC's Service one of two ways: (i) You may send us an email message at privacy@mobileauthcorp.com; (ii) using Your mobile device, You may text the word **"STOP"** to 62667. This will terminate all messages sent to You including any OTPs You or Your card issuers may request. SENDING AN OPT OUT MESSAGE TO MAC MAY RENDER IT DIFFICULT OR IMPOSSIBLE TO USE YOUR CREDIT, DEBIT OR GIFT CARD AND ANY FUNDS OR CREDIT IN YOUR CARD'S ACCOUNT.

Security

We take appropriate and reasonable technical and organizational measures to guard against unauthorized or unlawful processing of Your personal data and against accidental loss or destruction of, or damage to, Your personal data. MAC uses industry-standard security measures to protect the integrity and confidentiality of any Personal Data it owns or processes on behalf of Clients, including, in appropriate circumstances, the use of firewalls, restricted access, and encrypted transmissions. MAC limits access to Personal Data to those persons in MAC's organization who have a business need to process such Personal Data. However, no company, including MAC, can fully eliminate the security risks associated with such Personal Data. Due to factors beyond MAC's control, MAC cannot ensure that Personal Data will not be disclosed to third parties (see above language regarding disclosure due to lawful demand by authorities).

Disclaimer

We cannot ensure that all of Your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example

(without limiting the foregoing), We may be forced to disclose personal information to the government or third parties under certain circumstances. Third parties may unlawfully intercept or access transmissions or private communications, hack into our system or one of our third party provider's systems, or users may abuse or misuse your personal information that they collect from the Site. MAC does not review, comment upon, or monitor its Clients' compliance with their respective privacy policies, nor does MAC review Client instructions to determine whether they are in compliance or conflict with the terms of a Client's published privacy policy. Furthermore, if You are opted-in to receive advertising messages from one of MAC's advertising affiliates or partners, MAC does not review, compose or otherwise edit or manage the content of any advertising message and MAC does not guarantee or warrant that one or more messages sent to You may contain information that is inappropriate, distasteful to You or offers a product or service that is contrary to a product or service that You would ever consider buying. MAC is not responsible for the content of its advertisers' messages.

Third Parties

Please be advised this Privacy Policy does not apply to the practices of companies that MAC does not own or control, or to people that MAC does not employ or manage. This includes links to other websites on the Site as well as any companies from whom you may have ordered services or products that are transmitted over MAC'S network, and any companies from whom you may be purchasing telecommunications services. MAC recommends that you be aware when you leave the Site and read the terms of use and privacy policies of any site, product, or service that collects personally identifiable information.

Privacy Policy Updates

MAC may update its Privacy Policy from time to time without notifying You individually. If and when We change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy, and a notice will appear the next time You access Our Site. Be forewarned that policies and terms of use will change regularly, and if You do not use MAC's Services regularly, changes may occur between Your Service usage opportunities.

Update Information / Contact Us

If You would like to update or correct any information that You have provided to MAC through Your use of Our services, the mobile device application or the website, or You wish to limit or opt-out of certain communications, to revoke prior communication choices you have made, or to make suggestions for improving this privacy policy, please send an e-mail to privacy@mobileauthcorp.com, or fill out the form in the "Contact Us" link. We will use reasonable commercial efforts to address any concerns that You may have.

You may request assistance from MAC for OTP and advertiser-related issues by texting **“HELP”** to 62667 from Your mobile device.

MAC IS NOT A SUBSTITUTE FOR, NOR DOES MAC SUPPLY, EMERGENCY SERVICES (please touch “911” on Your mobile device for such urgent matters of life or death) TO ITS OTP USERS. TEXTING **“HELP”** TO MAC WILL NOT RESULT IN ANY ASSISTANCE TO YOU OTHER THAN SOLVING OR RESOLVING MATTERS RELATED TO YOUR MAC ACCOUNT.

In compliance with the US-EU and US-Swiss Safe Harbor Principles, MAC commits to resolve complaints about your privacy and our collection or use of Your personal information.

Any person - including European Union or Swiss citizens - with inquiries or complaints regarding this Privacy Policy should first contact MAC’s Privacy Officer at:

Mobile Authentication Corporation

ATTN: Michael J. Tarutis, Esq.

8777 E. Via de Ventura Suite 280

Scottsdale, AZ 85258 USA

Email: privacy@mobileauthcorp.com

or: mtarutis@mobileauthcorp.com

Telephone: 877-427-0411